

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL PARTNERS, LP :
and AURELIUS CAPITAL MASTER, LTD., : 07 Civ. 2715 (TPG)

Plaintiffs, :
: :
- against - :
: :
REPUBLIC OF ARGENTINA, :
: :
Defendant. :

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AURELIUS CAPITAL PARTNERS, LP :
and AURELIUS CAPITAL MASTER, LTD., : 07 Civ. 11327 (TPG)

Plaintiffs, :
: :
- against - :
: :
REPUBLIC OF ARGENTINA, :
: :
Defendant. :

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BLUE ANGEL CAPITAL I LLC, :

Plaintiff, : 07 Civ. 2693 (TPG)

- against - :

THE REPUBLIC OF ARGENTINA, :

Defendant.

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(captions continue on following pages)

DECLARATION OF SARA A. SANCHEZ

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AURELIUS CAPITAL MASTER, LTD. and ACP
MASTER, LTD., : 09 Civ. 8757 (TPG)

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

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AURELIUS CAPITAL MASTER, LTD. and ACP
MASTER, LTD., : 09 Civ. 10620 (TPG)

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

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AURELIUS OPPORTUNITIES FUND II, LLC and
AURELIUS CAPITAL MASTER, LTD., : 10 Civ. 1602 (TPG)

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

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AURELIUS OPPORTUNITIES FUND II, LLC and
AURELIUS CAPITAL MASTER, LTD., : 10 Civ. 3507 (TPG)

Plaintiffs,

- against -

THE REPUBLIC OF ARGENTINA,

Defendant.

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AURELIUS CAPITAL MASTER, LTD. and AURELIUS OPPORTUNITIES FUND II, LLC, : 10 Civ. 3970 (TPG)
Plaintiffs, :
- against - :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
----- X
BLUE ANGEL CAPITAL I LLC, : 10 Civ. 4101 (TPG)
Plaintiff, :
- against - :
REPUBLIC OF ARGENTINA, :
Defendant. :
----- X
BLUE ANGEL CAPITAL I LLC, : 10 Civ. 4782 (TPG)
Plaintiff, :
- against - :
REPUBLIC OF ARGENTINA, :
Defendant. :
----- X
AURELIUS CAPITAL MASTER, LTD. and AURELIUS OPPORTUNITIES FUND II, LLC, : 10 Civ. 8339 (TPG)
Plaintiffs, :
- against - :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
----- X

DECLARATION OF SARA A. SANCHEZ

Pursuant to 28 U.S.C. § 1746, Sara A. Sanchez declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel for defendant the Republic of Argentina (the "Republic") in these matters. I submit this declaration on behalf of the Republic in support of its Motion for a Protective Order and to Quash Eighteen Subpoenas Served on Non-Party Banks.
2. Attached to this declaration as Exhibits A-Z are true and correct copies of the following documents:

<u>Ex.</u>	<u>Document</u>
A	Plaintiffs' Requests for Production to Defendant, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
B	Subpoena served on Banco de la Nación Argentina, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
C	Subpoena served on Barclays Bank PLC, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
D	Subpoena served on Barclays Capital, Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
E	Subpoena served on Banc of America Securities LLC, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);
F	Subpoena served on Bank of America Corp., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);
G	Subpoena served on Bank of America, N.A., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);
H	Subpoena served on Citibank, N.A., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);

<u>Ex.</u>	<u>Document</u>
I	Subpoena served on Citicorp North America Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
J	Subpoena served on Citicorp USA Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
K	Subpoena served on Citigroup Global Markets Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
L	Subpoena served on Citigroup Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
M	Subpoena served on Deutsche Bank AG, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
N	Subpoena served on Deutsche Bank Americas Holding Corp., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
O	Subpoena served on Deutsche Bank Securities Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
P	Subpoena served on Deutsche Bank Trust Company Americas, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
Q	Subpoena served on Merrill Lynch & Co., Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);
R	Subpoena served on Merrill Lynch, Pierce, Fenner & Smith Inc., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);
S	Subpoena served on Taunus Corp., <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Dec. 13, 2011);
T	Republic of Argentina's Responses and Objections to Plaintiffs' Document Requests, <i>Aurelius Capital Partners, LP v. Republic of Argentina</i> , No. 07 Civ. 2715 (TPG) (S.D.N.Y. Jan. 12, 2012);

<u>Ex.</u>	<u>Document</u>
U	Letter of E. Stubbs to C. Boccuzzi (Feb. 2, 2012);
V	Letter of C. Boccuzzi to E. Stubbs (Feb. 17, 2012);
W	Subpoena served on Bank of America, N.A., <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Mar. 10, 2010);
X	Order, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Sept. 2, 2011);
Y	Order, <i>Seijas v. Republic of Argentina</i> , No. 04 Civ. 400 (TPG) (S.D.N.Y. Aug. 19, 2009);
Z	Hr'g Tr., <i>Lightwater v. Republic of Argentina</i> , No. 02 Civ. 3805 (TPG) (S.D.N.Y. Apr. 1, 2009).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2012, in New York, New York.



SARA A. SANCHEZ

A handwritten signature in black ink, appearing to read "Sara A." above "SANCHEZ". The signature is fluid and cursive.